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057-2006-2424-3RIGINAL

CARTMENT OF TOAKSTORTATION
1589 NOV OG PILIZ: 40
DOCKET SECTION

November 3, 1989

U.S. Department of Transportation Docket Section Room 4107 400 7th Street, S.W. Washington, D.C. 20590

In the matter of Expanding International Air Service Opportunities to more U.S. cities

Docket 46534

Comments by the Amsterdam Schiphol Airport

Respectfully submitted:

B. Waring Partridge, III 131 C Street, S.E.

Washington, D.C. 20003

for the Amsterdam-Schiphol Airport

Schiphol

N.V. Luchthaven Schiphol Postbus 7501 1118 ZG Luchthaven Schiphol Telefoon (020) 601 91 11

Mr. Jeffrey N. Shane
Assistant Secretary for Policy and
International Affairs
U.S. Department of Transportation
400 7th Street, S.W.
Washington, D.C. 20590
United States of America

Schiphol November 3, 1989 019635

Dear Mr. Shane,

You have asked for comments on the creative proposal put forward by you and Secretary Skinner to encourage competition and expand the international air service opportunities for U.S. communities.

You are to be commended for your leadership. We hope that this policy will set a standard for other nations to follow in bringing the economic benefits of international air service to more communities across the globe.

Amsterdam Airport Schiphol applauds the expansion of international air service regardless of the nationality of the air carrier. Towards this end, we are working with airports in several U.S. communities where we believe there is an immediate, unserved market for air service to Amsterdam.

As you know, for several years, Amsterdam Airport Schiphol has been seeking to have U.S. carriers add services to Amsterdam from many U.S. cities. We hope that U.S. carriers will respond to the competitive challenge raised by your proposal and take advantage of the virtually unlimited rights for U.S. carriers to serve Amsterdam. We shall welcome U.S. carriers from any U.S. city indeed.

We have long been concerned that the lack of initiative by U.S. carriers to add services to Amsterdam and the lack of rights for Dutch carriers to add services to U.S. have effectively blocked the development of competitive air services between Amsterdam and the U.S. This situation would not have occurred under the circumstances you now propose. Your proposal should go a long way towards sparking competition and opening up long overdue opportunities for air service and the related economic benefits for many deserving U.S. cities.

Schiphol

Bladnummer 2

Datum November 3, 1989

I am sure that you will receive reams of information on the increasingly well documented economic development and pro-competition benefits of your proposed policy. To add to the weight of this, I would like to identify some specific examples of U.S. communities which we believe will benefit after your proposed policy takes effect.

There are several U.S. communities with markets for service to Amsterdam which have no U.S. carrier willing to provide such services. We would welcome U.S. carriers to serve Amsterdam from any one of these cities. But since U.S. carriers remain unwilling to provide service to Amsterdam from these U.S. communities, service must be provided by Dutch carriers. It appears from the language of your proposal that all of these communities would qualify for approval of new international service to Amsterdam by a Dutch carrier.

Specific examples of communities with which we are now working to develop service, and to which your policy appears to apply, are listed in alphabetical order:

Baltimore Las Vegas Phoenix
Denver Minneapolis-St. Paul Pittsburgh
Hartford Oakland Seattle
Kansas City Philadelphia

For planning purposes, it is important for us and for the U.S. airports with which we are working to make sure that we understand this U.S. policy proposal accurately. As we understand your proposal, these U.S. communities would qualify for air service to Amsterdam by a Dutch carrier under your policy if:

- 1) A U.S. or foreign carrier does not already provide non-stop or one-stop single plane international air service to these communities from the Netherlands.
- 2) A pro-competitive agreement remains in place between the U.S. and the Netherlands, so that a basis does not exist for a traditional aviation trade to obtain benefits for U.S. airlines. (Any U.S. carrier can already serve Amsterdam freely from any point in the U.S.).
- 3) Dutch carrier proposals to serve these communities would only involve service between the U.S. and the Netherlands, not service to and from third countries.
- 4) There are no overriding public interest reasons for denying the requested authority.

Schiphol

Bladnummer 3

Datum November 3, 1989

If these criteria are met and no U.S. carrier has firm plans to provide service between Amsterdam and these cities, we understand that the U.S. Department of Transportation would approve an exemption for scheduled non-stop or one stop single plane service by a Dutch carrier to these cities if the carrier is properly licensed, properly applies for exemption authority and commences service on a timely basis.

Finally, it is important that this U.S. policy proposal be put into effect quickly, that exemption renewals not be unreasonably withheld and that renewals not be subject to anti-competitive abuse (e.g., renewals should not be withheld if U.S. carriers later decide to enter a market already served by a foreign carrier under this exemption authority). Since our airport and the U.S. airports with whom we are working will have to make substantial, long term fixed investments for facilities for the services stimulated by your new policy, we all need stable, long term, consistently applied policies to support these long term investments.

Sincerely,

AMSTERDAM AIRPORE SCHIPHOL

Karel J. Noordzy Managing Director